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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In Re:	
Barbara Jean Lucas and James Walter Lucas	Chapter 11
Debtor(s)	Case Number: 16-32586-VFP
	Judge: Vincent F. Papalia

**OBJECTION OF WATERFALL VICTORIA GRANTOR TRUST II, SERIES G TO DEBTOR'S
FIFTH AMENDED CHAPTER 11 PLAN WITH RESPECT TO REAL PROPERTY LOCATED
AT 280 -282 CLINTON PLACE, NEWARK, NJ 07112**

Waterfall Victoria Grantor Trust II, Series G (hereinafter, "Creditor"), through its Counsel, Stern & Eisenberg, PC, respectfully requests that this Honorable Court deny confirmation of the Chapter 11 Plan filed by Debtor Barbara Jean Lucas and James Walter Lucas (hereinafter, "Debtors"). In support thereof, Creditor respectfully represents as follows:

1. On October 31, 2007, Debtors signed a note and mortgage in the principal sum of \$204,000.00, evidencing a loan from MERS Inc., as nominee for Equity One, Inc., in the same amount, secured by the real property located at 280 -282 Clinton Place, Newark, NJ 07112 (hereinafter, the "Property"), as evidenced by a mortgage recorded with the Clerk of Essex County on October 6, 2009 in Book 12229 at Page 9706.
2. Creditor is the holder of the note and assignee of the mortgage for the Property listed above.
3. Debtors filed a Chapter 13 Bankruptcy Petition on November 28, 2016 and as a result, any State Court proceedings were stayed.
4. By Order of Court, Debtors' case was converted to a Chapter 11 on June 9, 2017.
5. Creditor timely filed a Proof of Claim, Claim 4-1 on January 11, 2017 which sets forth a total amount due on Creditor's lien of \$270,763.16.
6. Debtor's Fifth Amended Plan proposes to satisfy Creditor's claim as a modified claim of \$110,000.00. Credit objects to this valuation as Creditor's Broker Price Opinion values the Property at \$120,000.00.

7. This Objection is made in accordance with the Federal Rules of Bankruptcy Procedure.

WHEREFORE, Creditor, Waterfall Victoria Grantor Trust II, Series G by and through its Counsel, Stern & Eisenberg, PC, respectfully requests that this Honorable Court deny confirmation of the Fifth Amended Chapter 11 Plan and dismiss the Chapter 11 Bankruptcy Petition together with such other relief this Court deems necessary and appropriate.

Respectfully Submitted:

Stern & Eisenberg, PC

By: /s/ STEVEN P. KELLY, ESQ. _____

STEVEN P. KELLY, ESQ.

Stern & Eisenberg, PC

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Phone: (609) 397-9200

Fax: (856) 667-1456

Bar Number: 010032010

Counsel for Movant

Date: February 7, 2019

STEVEN P. KELLY, ESQ.
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Recommended Local Form	<input type="checkbox"/> Followed	<input checked="" type="checkbox"/> Modified
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ORDER DENYING CONFIRMATION

The relief set forth on the following page is hereby ***ORDERED***.

(page 2)

Debtor: Barbara Jean Lucas and James Walter Lucas

Case Number: 16-32586-VFP

Caption of Order: Order Denying Confirmation (and other relief)

Upon the Motion of Waterfall Victoria Grantor Trust II, Series G, through its Counsel, Stern & Eisenberg, PC, under the Bankruptcy Code and Rules of Bankruptcy Procedure as to the real property located at 280 -282 Clinton Place, Newark, NJ 07112, and for good cause shown, it is:

ORDERED that the confirmation of the Fifth Amended Chapter 11 Plan is DENIED.

STEVEN P. KELLY, ESQ.
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In Re:	Chapter 11
Barbara Jean Lucas and James Walter Lucas	Case Number: 16-32586-VFP
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**Memorandum of Law in Support of Objection of Waterfall Victoria Grantor Trust II, Series G to
Fifth Amended Chapter 11 Plan. With Respect to Real Property Located at 280 -282 Clinton
Place, Newark, NJ 07112**

The issues presented in the instant motion are not complicated. Therefore, no memorandum of law is required.

Respectfully Submitted:

Stern & Eisenberg, PC

By: /s/ Steven P. Kelly, Esq.

Steven P. Kelly, Esq.

Stern & Eisenberg, PC

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Bar Number: 010032010

Counsel for Movant

Date: February 7, 2019

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CERTIFICATE OF SERVICE

I, STEVEN P. KELLY, ESQ., hereby certify that a true and correct copy of the within Objection to the Chapter 11 Plan of Waterfall Victoria Grantor Trust II, Series G, together with Order and this Certificate, was sent to the Debtor Counsel and the Trustee and all other required parties in accordance with the Rules of Bankruptcy Procedure on the date set forth below.

Respectfully submitted,

STERN & EISENBERG, PC

By: /s/ Steven P. Kelly, Esq.
Steven P. Kelly, Esq.
Stern & Eisenberg, PC
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Phone: (609) 397-9200
Fax: (856) 667-1456
Bar Number: 010032010
Counsel for Movant

DATE: February 7, 2019

Service List:

Name and Address of Party(ies) Served	Relationship of Party(ies) to the Case	Mode of Service
U.S. Trustee Office of the U.S. Trustee One Newark Center, Suite 2100 Newark, NJ 07102	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <small>Unless not a participant in ECF</small> <input type="checkbox"/> Other: _____ (as authorized by the Court*)
Scott J. Goldstein 280 West Main Street Denville, NJ 07834	Debtor Counsel	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <small>Unless not a participant in ECF</small> <input type="checkbox"/> Other: _____ (as authorized by the Court*)
Barbara Jean Lucas and James Walter Lucas 280 -282 Clinton Place Newark, NJ 07112	Debtors	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-Mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <small>Unless not a participant in ECF</small> <input type="checkbox"/> Other: _____ (as authorized by the Court*)